

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ADAM PEZEN, individually and on behalf of all others similarly situated, )  
vs. )  
FACEBOOK, INC., )  
Defendant. )

Case No.: 15-cv-3484  
Hon. James B. Zagel

**FACEBOOK'S RESPONSE TO PLAINTIFF'S MOTIONS TO  
RELATE AND REASSIGN CASES PURSUANT TO LOCAL RULE 40.4**

Defendant Facebook, Inc. ("Facebook"), by and through its undersigned counsel, agrees to the relief sought in the two motions that Plaintiff Adam Pezen ("Plaintiff") filed pursuant to Local Rule 40.4 to relate and reassign to this Court's docket two similar cases pending in the Northern District of Illinois. *See* Dkt. Nos. 9; 11. Specifically, Facebook agrees that *Licata v. Facebook, Inc.*, No. 1:15-cv-04022 (N.D. Ill.), currently pending before Judge Bucklo, and *Patel v. Facebook, Inc.*, No. 1:15-cv-04265 (N.D. Ill.), currently pending before Judge Ellis, each meets the requirements of Rule 40.4 such that they both should be deemed related to this action and reassigned to this Court's docket.<sup>1</sup>

Dated: May 19, 2015

Respectfully submitted,

By: /s/ Vincent Connelly

Vincent Connelly  
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<sup>1</sup> Facebook specifically preserves and does not waive its right to contest the Court's personal jurisdiction over Facebook in each of the three cases.

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*Counsel for Defendant Facebook, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on May 19, 2015, **Facebook's Response to Plaintiff's Motions to Relate and Reassign Cases Pursuant to Local Rule 40.4** was electronically filed with the Clerk of the Court using the CM/ECF system and that copies of the foregoing were sent electronically via that system to all parties of record.

Dated: May 19, 2015

By: /s/ Michael D. Frisch  
Michael D. Frisch

*Counsel for Defendant Facebook, Inc.*